

Welcome to CAAAC



A scenic mountain landscape with evergreen trees, rolling hills, and a blue sky with white clouds. The text "Legislative Session Recap" is overlaid in the upper center.

Legislative Session Recap

Dave Klemp

Air Quality Fee Update

Dave Klemp



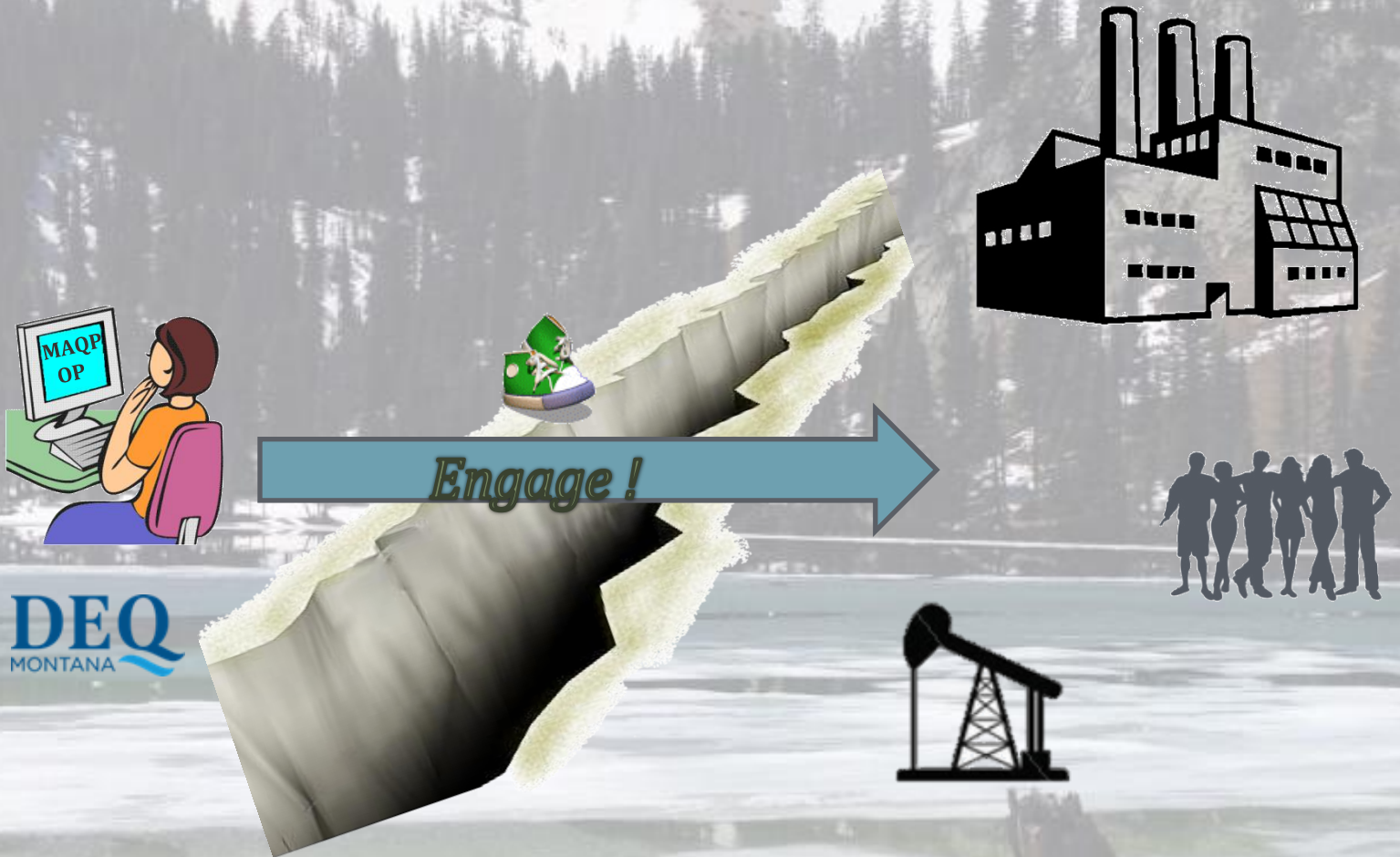
Field Presence Update

Hoby Rash

Compliance



Compliance



“Field Presence”



“Field Presence”

1. Compliance Assistance



2. Verification



3. Communication



4. Education



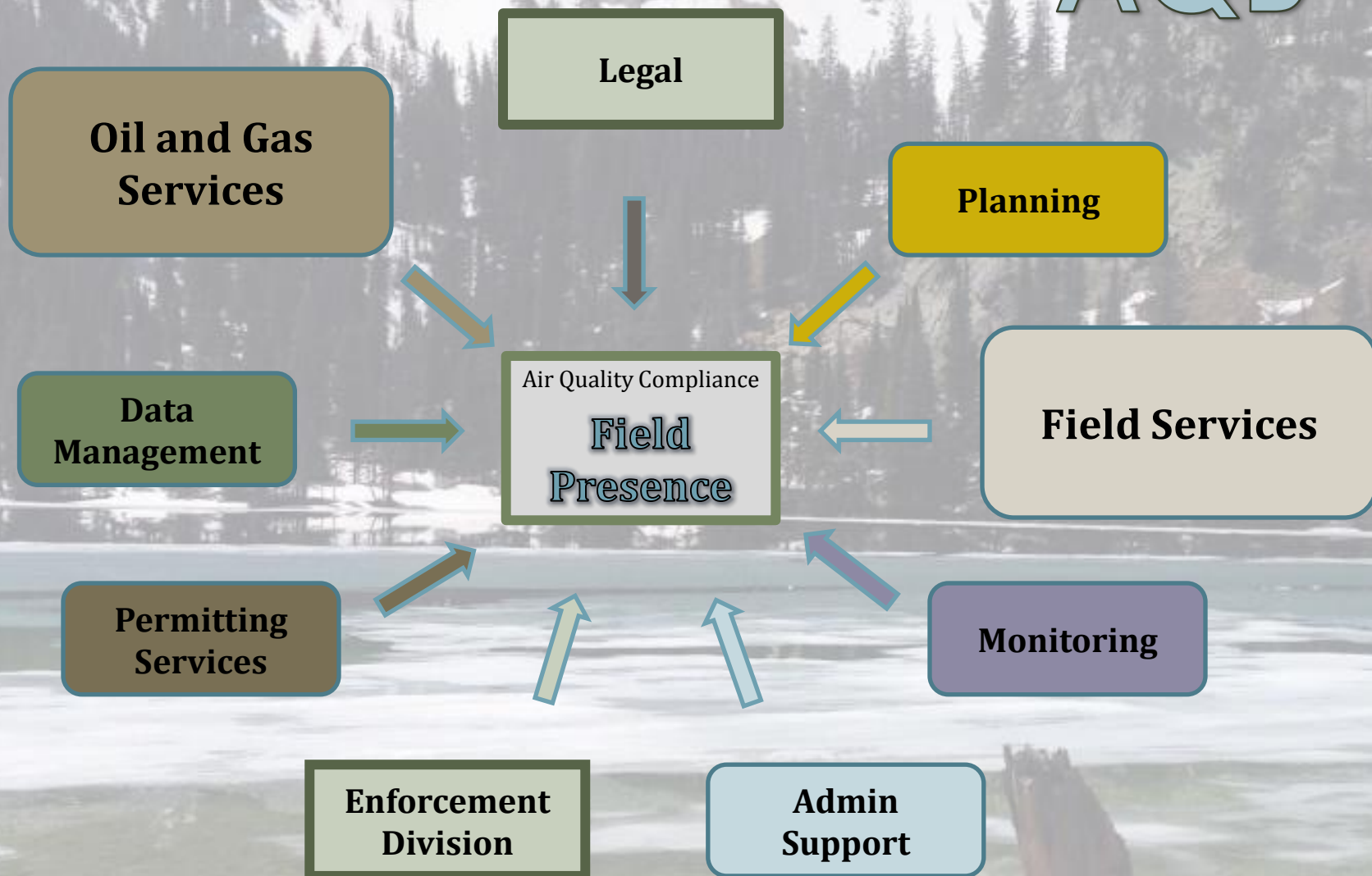
5. Collaboration



6. Correction



AQB





Air Quality Rules

Doug Kuenzli & Julie Ackerlund

Ambient Air Monitoring Program Quality Assurance Project Plan (QAPP) Update

Details the monitoring programs quality system

- ▶ Representative
 - ✓ Data supports the monitoring objective
- ▶ Control measurement uncertainty
 - ✓ Ensure data is of the highest quality and of acceptable value

Ambient Air Monitoring Program Quality Assurance Project Plan (QAPP) Update

Additional Elements of the Montana QAPP:

- ▶ Required by 40 CFR Part 58, Appendix A
- ▶ DEQ specific document
- ▶ Last updated 2013

*QAPP required by other monitoring entities
under ARM 17.8.204

Ambient Air Monitoring Program Quality Assurance Project Plan (QAPP) Update

2017 QAPP Updates:

- ▶ Administrative changes
- ▶ Technical changes
- ▶ Regulatory revisions

<http://deq.mt.gov/Air/airmonitoring/monitoringdocuments>

Rulemaking Activities in the Air Quality Bureau

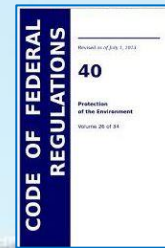
Incorporation by Reference (IBR)

Municipal Solid Waste (MSW) Landfill
Emission Guidelines

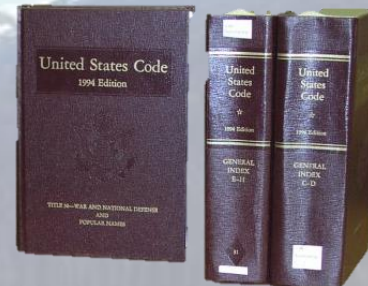
Julie Ackerlund, Air Quality Planner

IBR, amend our rules to adopt the following versions:

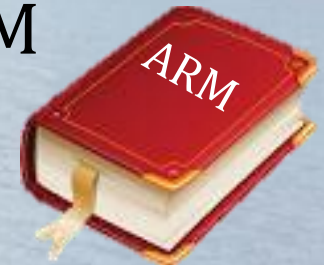
- July 1, 2016 CFR



- 2015 U.S. Code



- Rules from other chapters of the ARM in effect on September 30, 2016



IBR, changes to exemptions in ARM 17.8.102(2):

Remove exemption of NESHAPS

- Subpart JJJJJ (Brick and Structural Clay Products Manufacturing)
- Subpart KKKKK (Clay Ceramics Manufacturing)



Add exemptions of NSPS

- Subpart 0000a (Oil and Gas Industry)
- Subpart TTTT (part of Clean Power Plan)



IBR, availability of reference material:

1. Correct outdated contact information
2. Centralize the location to ARM 17.8.102(3) – (4)
 - Remove citations of where to find reference material from ARM 17.8.103, 17.8.202, 17.8.302, 17.8.602, 17.8.767, 17.8.802, 17.8.902, 17.8.1002, 17.8.1102, 17.8.1202, 17.8.1302, 17.8.1402, and 17.8.1502

IBR, subchapter 9:

1. In ARM 17.8.901(16), revise the definition of PM_{2.5} 'precursor' to include NO_x in nonattainment areas.
2. In ARM 17.8.904(7), revise the internal reference citation to ARM 17.8.904~~(5)~~(6).

IBR, QAPP:

- Adopt the 2017 version of the *Montana Ambient Air Monitoring Program Quality Assurance Project Plan* (QAPP).



New MSW Landfill Rules

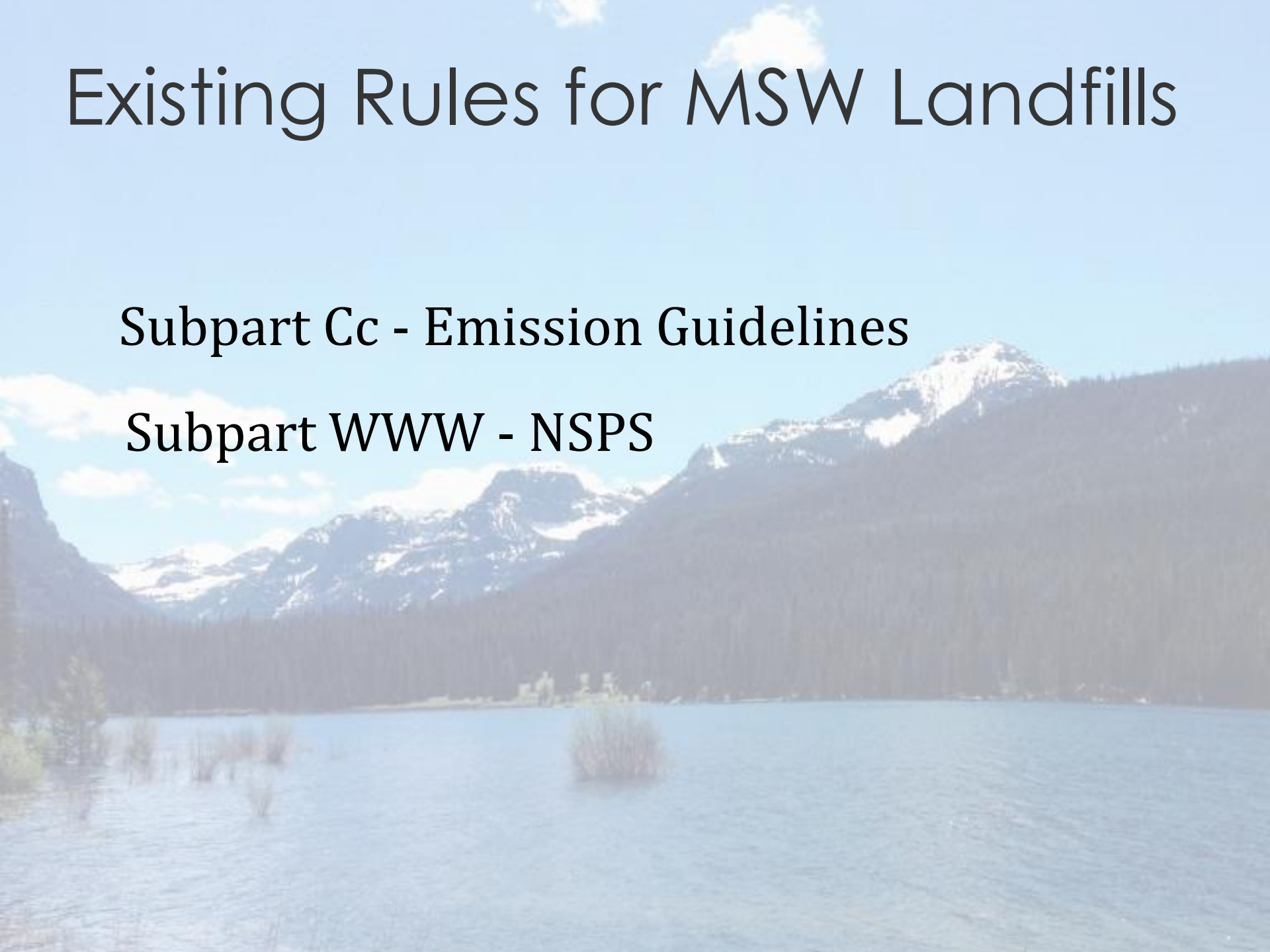
- 40 CFR Part 60 Subpart Cf - Emission Guidelines
- 40 CFR Part 60 Subpart XXX - New Source Performance Standard



Existing Rules for MSW Landfills

Subpart Cc - Emission Guidelines

Subpart WWW - NSPS



Section 111(d) State Plan Rulemaking for the Emission Guidelines

- Working with Solid Waste Advisory Council (SWAC) on the new rules.
- Adopt ARM 17.8.340(6), rules needed for a state plan.

Montana Class II Landfills

- 28 MSW landfills, plus 4 more on reservations
- Most of these will be subject to Subpart Cf
- Several are expected to be Subpart XXX in the near future

Highlights of the New MSW Rules

- Allow landfills an additional method to estimate landfill emissions.
- Lowered the emissions threshold to install gas collection and control systems.
 - ✓ Expect one more facility to install a gas collection and control system.
- Increased monitoring at facilities with gas collection and control systems.

Questions?





Oil & Natural Gas Production Regulatory Review

Dave Aguirre

Oil & Natural Gas Regulatory Review

Environmental Protection Agency

- Federal Implementation Plan – Minor New Source Review (NSR) on Indian Lands
- Source Determination Rule (Aggregation)
- Standards of Performance for New Stationary Sources (NSPS) - 0000a
- Control Technique Guidelines (CTGs)
- Information Collection Request (ICR)

Bureau of Land Management

- Waste Prevention, Production Subject to Royalties, and Resource Conservation

Regional Haze Update

Rebecca Harbage

Updates

- Final Revision of Regional Haze Rule
- Revision of 2012 Federal Implementation Plan
- Internal Draft Progress Report

“modify the set of days used to track progress towards natural visibility conditions to account for events such as wildfires;”

“flexibility to address impacts on visibility from anthropogenic sources outside the United States (U.S.) and from certain types of prescribed fires;”

“we are proposing to revise the nitrogen oxides (NO_x) emission limit for the Trident cement kiln.”

“correct errors we made in our FIP regarding the reasonable progress determination for the Blaine County #1 Compressor Station”



What Progress Report?

- Regional Haze Periodic Progress Report
- Required in 40 CFR 51.308(g)
- Due 5 years after FIP
- Reports progress achieved since baseline
- SIP submittal

What Progress Report?

Status of implementation of control measures in initial plan (FIP)

Emission reductions resulting from the control measures

Assessment of current visibility conditions and visibility trends

General emission trends over past five years

Assessment of significant emission changes potentially impeding progress

Assessment of whether initial plan was sufficient to meet visibility goals

Review of visibility monitoring strategy

Determination of adequacy of initial plan and plan revision, if necessary

Current Status

Progress Report

- Beginning stages of stakeholder engagement
- Met with affected facilities

2018-2028 State Implementation Plan

- Staying involved in regional discussions
- Technical analysis work begins soon

Next Steps

Progress Report

- Federal Land Manager consultation & public comment
- Submittal to EPA in October

2018-2028 State Implementation Plan

- Due in 2021 for the 2018-2028 period
- Which facilities will be subject to reasonable progress controls?

June 2016 – May 2017

Research

Draft

Review

5-YEAR
PROGRESS
REPORT

May 2017 – Oct. 2017

Engage

Consult

Submit

Late-Oct. 2017 – 2019

Perform Regional Technical Analysis


2018-2028
STATE IMPLEMENTATION
PLAN (SIP)

2019 – 2021

Engage

Consult

Submit



Questions?

Rebecca Harbage
Regional Haze Project Manager
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“PPIP”

Permitting Program
Improvement Project

Julie Merkel

Finding a new way to do business

- Fee based program
- Changing universe of sources
- Streamlining the process
- Continue to maintain protection of air quality



Permits by Rule/Registration

- Facility registers with the Department and complies with specific requirements for that type of source
- Once registered, the facility is deemed to have a permit, thereby authorizing operation without going through a longer process of obtaining an MAQP

Crushing/Screening Industry

- *Nonmetallic mineral processing plant* – any combination of equipment that is used to crush or grind any nonmetallic mineral or rock
- Conditions in each MAQP is nearly identical
- Standardized, boiler-plate language

Advantages of Registration

- Registration will save time and money on resources typically required to put a permit application together
- There will be no wait for application processing which can take up to 90 days
- Less processing time for DEQ
- The environment will be protected by the registration because it contains all the substantive requirements necessary for facilities to comply with air quality standards.

Progress

- DRAFT Rules for Internal Review
- Researching MEPA Requirements
- Stakeholder Engagement

Monitoring Network Review

Doug Kuenzli

Ambient Air Monitoring Program Annual Monitoring Network Plan

Plan Requirements (40 CFR Part 58.10)

- ▶ Defines current network
- ▶ Conformity to monitoring rule
- ▶ Address network modifications
- ▶ Opportunity for stakeholder engagement

Ambient Air Monitoring Program Annual Monitoring Network Plan

2017 Network Plan Changes

- ▶ Relocate Sidney Station
- ▶ Colstrip lead monitoring waiver request
- ▶ Add PM_{2.5} monitors:
 - * Thompson Falls
 - * Dillon (New Site)

Annual Monitoring Network Plan

Network Plan Timeline:

- 30 day public inspection and comment
- EPA Region 8 submission – July 1st
- EPA approval/disapproval within 120 days

Annual Monitoring Network Plan

Public Inspection & Comment Period

Plan to be posted on or before June 1st, 2017

<http://deq.mt.gov/Public/publiccomment>

Thank You!

